



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS/RMP
F. #2021R00600

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 3, 2024

Kenneth Abell
Jarrod L. Schaeffer
Abell Eskew Landau LLP
256 Fifth Avenue, 5th Floor
New York, NY 10001

Seth DuCharme
Nicole Boeckmann
Bracewell LLP
31 W. 52nd Street, Suite 1900
New York, NY, 10019-6118

By Email and ECF

Re: United States v. Sun, et. al.
Criminal Docket No. 24-CR-346 (BMC)

Dear Counsel:

Enclosed please find the below-listed materials produced in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which are contained on hard drives produced separately to counsel for the respective defendants. The government renews its request for reciprocal discovery from the defendants.

Bates No.	Description of Item
EDNY_009878	Extraction of Sandisk Cruzer 8 GB USB Flash Drive seized from the business identified in the Indictment as the "Wine Store"

Bates No.	Description of Item
EDNY_009879	Extraction of Silver Dell XPY Laptop seized from the business identified in the Indictment as the “Wine Store”
EDNY_009880	Records from Shopify Inc.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Alexander A. Solomon
Alexander A. Solomon
Robert M. Pollack
Assistant U.S. Attorneys
(718) 254-7000

cc: Clerk of the Court (BMC) (by ECF)